

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ASHTON WHITAKER,

Plaintiff,

v.

KENOSHA UNIFIED SCHOOL DISTRICT
NO. 1 BOARD OF EDUCATION,

Defendants.

Civ. Action No. 2:16-cv-00943-PP
Judge Pamela Pepper

**JOINT NOTICE OF SETTLEMENT AND
MOTION TO APPROVE CONSENT JUDGMENT**

Plaintiff Ashton Whitaker (“Plaintiff”) and Defendant Kenosha Unified School District Board of Education No. 1 (“Defendant”) (collectively, the “Parties”), jointly notify the Court that they have reached a settlement agreement in the above-captioned matter and respectfully move this Court to approve and enter the Parties’ proposed Consent Judgment (attached), for the reasons stated in paragraphs 1-11 of the proposed Consent Judgment. The stipulated settlement terms are listed in paragraphs A-G of the proposed Consent Judgment. Upon the Court’s approval of the Consent Judgment, the Parties further request that the Court vacate all pending deadlines and motions in the case.

As stated in the proposed Consent Judgment, the Parties agree (1) that the Consent Judgment shall remain binding on Defendant for a period of 10 years from the date of the Parties’ filing of the proposed Consent Judgment or unless and until modified by the Court on motion with proper cause under Federal Rule of Civil Procedure 60; and (2) that the Court shall retain jurisdiction of this action and the Parties for purposes of enforcement, interpretation, and

modification of the Consent Judgment for a period of 10 years from the date of the Parties' filing of the proposed Consent Judgment.

Based on the foregoing, the Parties respectfully request that the Court grant this motion; approve and enter the proposed Consent Judgment; and vacate all pending deadlines and motions in this action.

Dated: January 22, 2018

Respectfully submitted,

/s Joseph J. Wardenski

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/s Ronald S. Stadler (with consent)

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